

# **EXHIBIT I.6**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION  
4   IN RE NATIONAL PRESCRIPTION           |   MDL No. 2804  
5   OPIATE LITIGATION                   |  
6   This Document Relates to:           |   Case No. 17-MD-2804  
7   The County of Summit, Ohio,       |   Hon. Dan A. Polster  
8   et al., v.                           |  
9   Purdue Pharma L.P., et al.       |  
10   Case No. 17-op-45004               |  
11   The County of Cuyahoga v.       |  
12   Purdue Pharma L.P., et al.       |  
13   Case No. 18-op-45090               |  
14   City of Cleveland, Ohio v.       |  
15   Purdue Pharma L.P., et al.       |  
16   Case No. 18-op-45132               |

17  
18                   THURSDAY, JANUARY 24, 2019  
19  
20                   - - -  
21  
22                   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
23                   CONFIDENTIALITY REVIEW  
24                   - - -

25                   Videotaped deposition of PATRICK COCHRANE,  
26   held at Foley & Lardner LLP, One Biscayne Tower,  
27   2 Biscayne Boulevard, Suite 1900, Miami, Florida,  
28   commencing at 9:13 a.m., on the above date,  
29   before Kelly J. Lawton, Registered Professional  
30   Reporter, Licensed Court Reporter, Certified  
31   Court Reporter.

32                   - - -  
33                   GOLKOW LITIGATION SERVICES  
34                   877.370.3377 ph | 917.591.5672 fax  
35                   deps@golkow.com

1           A.    Yes.  There have been additional  
2   responsibilities flexed in and flexed out, but the  
3   core of that position has been the distribution  
4   activities of our facilities.

5           Q.    Okay.  Do you have an understanding as to  
6   what the term "suspicious order" means?

7           A.    Yes, I do.

8           Q.    What is your understanding of that term?

9           A.    A suspicious order is something that deviates  
10   from what the norm is.

11          Q.    Now, I asked you whether you had an  
12   understanding.

13                For purposes of company operations, what  
14   is -- does Anda have a working understanding of what  
15   the term "suspicious order" is?

16          A.    Anda does.

17          Q.    Okay.  And what is that definition?

18          A.    On order that deviates from the norm.

19          Q.    Okay.  Does Anda, for purposes of its  
20   day-to-day working policies, also utilize a  
21   functional definition of the term "suspicious order  
22   monitoring system"?

23          A.    Yes.

24          Q.    And what is the definition that the company

1 uses for suspicious order monitoring system?

2 A. A suspicious ordering monitoring system  
3 relates to the entire program of work, policies,  
4 procedures, either system or manual, related to  
5 handling and distributing controlled substances.

6 Q. In that answer, you included the term "either  
7 system or manual."

8 What did you mean by that?

9 A. There are system procedures in place and  
10 system -- system work that is performed. And there's  
11 manual work, and there are manual procedures.

12 Q. In the context of Anda's implementation of  
13 suspicious order monitoring system work, can you give  
14 me an example of both the system procedure and the  
15 manual procedure?

16 A. Sure.

17 The system procedures would be around  
18 validating orders, around checking eligibility of a  
19 customer, upon checking eligibility of a limit,  
20 checking current access and purchases towards that  
21 limit.

22 The manual aspects of it would include all  
23 aspects of controlled substance handling from  
24 receiving to put-away to physical security to

1 physical inventories performed on said inventory to  
2 the pick, pack, and ship operations.

3 Q. I'd like to first focus on what you have  
4 identified as the manual procedures that Anda  
5 utilizes as part of its suspicious order monitoring  
6 system.

7 Can you describe for me the manner in which  
8 orders for controlled substances are received by  
9 Anda?

10 A. The manner in which they are received?

11 Q. Yes.

12 MR. MATTHEWS: Objection.

13 Is there a time period?

14 MR. NOVAK: I appreciate that, because --  
15 let's say 2006 to now. And to the extent that  
16 the answer differs over that part -- that time  
17 period, we can talk about those differences.

18 THE WITNESS: Orders can be received by Anda  
19 via telephone, via Internet, via EDI, via paper  
20 222 Form.

21 BY MR. NOVAK:

22 Q. Are all of those ways in which the company  
23 received orders for controlled substances?

24 A. Yes.